



United States Department of the Interior

NATIONAL PARK SERVICE

Cape Cod National Seashore Advisory Commission

Cape Cod National Seashore

99 Marconi Site Road

Wellfleet, MA 02667

508.771.2144

October 7, 2016

Governor Charles Baker
Massachusetts State House
Office of the Governor
Room 280
Boston, Massachusetts
02133

Dear Governor Baker,

We, the members of the Cape Cod National Seashore Advisory Commission, represent the towns of Orleans, Chatham, Eastham, Wellfleet, Truro and Provincetown, the county of Barnstable, your office and the Secretary of the Interior. We are appointed by the Secretary of the Interior of the United States.

The Cape Cod National Seashore Advisory Commission was authorized by Section 8 of PL 87- 126, part of the enabling legislation which created the Cape Cod National Seashore in 1961. We are one of the oldest National Park Service advisory bodies in the nation, and subject to The Federal Advisory Committee Act of 1972 (PL 92-463). Our charge is to "serve in various matters relating to the administration and development of the Seashore by the federal government as liaisons between the federal government on the one hand, and state and local governments on the other."

We, write to you to express our grave concerns about the degraded Pilgrim Nuclear Power Plant in Plymouth. We ask that in your role as chief safety officer of the Commonwealth you demand that the Nuclear Regulatory Commission closes Pilgrim now to protect the citizens of Cape Cod and the over 4 million visitors who come to our beautiful National Seashore each year. (1)

In 2015, the Nuclear Regulatory Commission (NRC) downgraded Pilgrim's performance to one of the three worst nuclear power plants in the country, declaring it one step away from a shutdown. We are aware that Entergy will be decommissioning Pilgrim in 2019, but despite a lengthy list of violations and unplanned shut downs it continues to operate.

Over the past several months our concern about a potential radiological disaster at the plant has risen as we regularly learn of its myriad malfunctions.

Citizens of Cape Cod seem especially vulnerable to a radiological plume from Pilgrim because there is no evacuation plan for us, instead we would be told to shelter in place and await relocation to where?

In response to a question as to what the plan is for us post radiological disaster, MEMA director Kurt Swartz answered as follows:

"Over the next number of days, we would have mapped this area and once we had identified this area we would then issue a relocation order and order anyone within this area to leave the area. And we would enforce that order. *This is not an evacuation.* [emphasis added] An evacuation is an emergency quick get out of town order which says get in your car and get the hell out of town because there is an imminent danger. This is not an evacuation. This is a relocation." (Kurt Schwartz, Director of Massachusetts Emergency Management Agency, comments to the Barnstable County Regional Emergency Planning Committee on Oct. 3, 2012).

In our collective opinion, this is an unrealistic plan. Even the rumor of an accident in Plymouth would send people to their cars in an attempt to get off the Cape rather than sheltering in place. This would cause chaos and traffic jams on our only evacuation route, Route Six, and at the other side of the bridges, preventing the southward or westward evacuation of those in the 10 mile emergency zone around Pilgrim.

In fact, it is shocking to know, should there be an actual emergency, the only access to Cape Cod, the two bridges would be closed and NO ONE would be able to leave Cape Cod by car. This is totally unacceptable. A true disaster plan that protects the health and life of people on Cape Cod needs to be developed.

In addition to the public health and safety threat that the degraded Pilgrim plant poses, there is the looming threat of a major economic disaster for the Commonwealth of Massachusetts. On Cape Cod, tourism and real estate are the major economic engines. Both could be severely impacted for years, and house values would plummet should there be a radiological event at Pilgrim. Indeed Cape Cod towns could become uninhabitable and the economic losses would be incalculable.

In February of 2014, the Cape Cod National Seashore Advisory Commission released a study outlining the disastrous economic consequences of a radiological event at Pilgrim. (2) We have attached that paper for your review. Among its findings the report estimated that "a small-scale release of radioactive material at the plant could result in the loss of \$741 million to \$1.6 billion in tourist expenditures and \$23 million to \$63 million in state tax revenue over five years. A large scale disaster would likely increase the damage to \$2.2 to \$12.1 billion in tourist expenditure losses and cut overall economic output by \$45 to \$71 billion over 10 years". The study further predicts that the effects of a radio-

logical accident at Pilgrim "could contract the gross domestic product by up to 1.5%, possibly resulting in a recession."

Recently we learned that the Massachusetts congressional delegation sent a letter to the Nuclear Regulatory Commission (NRC) asking it to deny Entergy's request for an extension for critical safety upgrades to the Pilgrim Nuclear Power Station. These safety upgrades were recommended by a panel of Energy's own engineers after the March 2011 disaster at Fukushima Daichi in Japan.

Pilgrim is the same design as the reactors in Fukushima and subject to the same vulnerabilities. Signing the letter were Senators Edward J. Markey and Elizabeth Warren, and Reps. Michael E. Capuano, William R. Keating, Joseph P. Kennedy, III, Stephen F. Lynch, James P. McGovern, Seth Moulton, Richard Neal, Niki Tsongas.

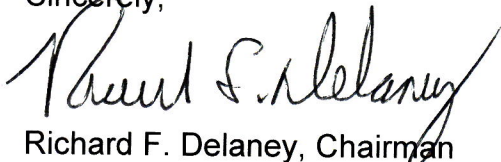
To quote from their letter to NRC chairman Stephen Burns:

"Notwithstanding its intention to shut down the plant, Entergy has a paramount responsibility to minimize the risk of catastrophic accidents similar to the one that occurred at Fukushima, exempting Pilgrim from the NRC's safety requirements would allow Entergy to abdicate that responsibility, unjustifiably exposing Massachusetts communities to danger."

The facts show that neither Entergy nor the Nuclear Regulatory Commission has demonstrated any concern for our citizens. We need your leadership in demanding that the Pilgrim nuclear reactor is shut down now rather than allowed to operate in an unsafe manner. We also ask that a true disaster plan for Cape Cod is developed that puts the health and safety of the people first.

We thank you Governor for considering this serious matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard F. Delaney", written in a cursive style.

Richard F. Delaney, Chairman
Cape Cod National Seashore Advisory Commission

Attachment

cc:

The Honorable Elizabeth Warren
The Honorable Edward Markey
Kurt Schwartz, Director, Massachusetts Emergency Management Agency
Monica Bharel, Commissioner, Massachusetts Department of Public Health
W. Craig Fugate, Administrator, Federal Emergency Management Agency
The Honorable Maura Healy, Massachusetts Attorney General

The Honorable William R. Keating, U.S. House of Representatives
 The Honorable Daniel A. Wolf, Massachusetts State Senator
 The Honorable Sarah K. Peake, Massachusetts State Representative
 George Price, Superintendent, Cape Cod National Seashore
 Judith Stephenson, CCNS Advisory Commission Representative, Commonwealth of Massachusetts
 Mark Robinson, CCNS Advisory Commission Representative, Commonwealth of Massachusetts (Alternate)
 Sheila Lyons, CCNS Advisory Commission Representative, Barnstable County
 William Clark, CCNS Advisory Commission Representative, Barnstable County (Alternate)
 Mary Jo Avellar, CCNS Advisory Commission Representative, Provincetown
 David Panagore, CCNS Advisory Commission Representative, Provincetown (Alternate)
 Maureen Burgess, CCNS Advisory Commission Representative, Truro
 Jay Coburn, CCNS Advisory Commission Representative, Truro (Alternate)
 Lilli Green, CCNS Advisory Commission Representative, Wellfleet
 Kathleen Bacon, CCNS Advisory Commission Representative, Wellfleet (Alternate)
 Don Nuendel, CCNS Advisory Commission Representative, Eastham
 Nat Goddard, CCNS Advisory Commission Representative, Eastham (Alternate)
 Larry O. Spaulding, CCNS Advisory Commission Representative, Orleans
 Bob Summersgill, CCNS Advisory Commission Representative, Orleans (Alternate)
 Joseph Craig, CCNS Advisory Commission Representative, Chatham

1. U.S National Park Service< "Economic Benefits to our Local Communities from National Park Visitation.2011."
http://www.nature.nps.gov/socialscience/docs/NPSS_SystemEstimates2011.pdf
2. An Analysis of the Impact of Disaster at the Pilgrim Nuclear power Plant on the Economy of Cape Cod
www.nps.gov/caco/parkmgmt/upload/PilgrimreportfinalV7.pdf